



Indiana Department of Education

SUPPORTING STUDENT SUCCESS

Differentiated Learners Division

November 1, 2009

Dr. Jerry Thacker, Superintendent
Penn-Harris-Madison School Corporation #7175
55900 Bittersweet Road
Mishawaka, Indiana 46545

Dear Dr. Thacker:

On September 13, 2009, the Indiana Department of Education's (IDOE) monitoring team commenced an on-site monitoring review of the Penn-Harris-Madison School Corporation's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Penn-Harris-Madison School Corporation is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, Penn-Harris-Madison School Corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you, Pamela Holt, and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Penn-Harris-Madison School Corporation to improve the delivery of Title I services.

Sincerely,

Teresa Neely, Title I Coordinator
Indiana Department of Education

cc: Pamela Holt, Title I Program Administrator
Penn-Harris-Madison School Corporation

Lee Ann Kwiatkowski, Director of Differentiated Learners
Indiana Department of Education

**Indiana Department of Education
Title I and Title II, Part A Monitoring**

District: Penn-Harris-Madison School Corporation

Monitoring Date: September 13, 2009

Monitoring Team: Teresa Neely, Lenee Reedus, Linda Ricketts, Laura Cope, Quin Fratzke

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of Penn-Harris-Madison School Corporation on September 13, 2009. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I and Title II, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals; Compliance with comparability requirement	NCLB §1111(h)(6)(A) NCLB §1112(c)(1)(L) NCLB §1119(c)(1) NCLB §9101(23) NCLB §2123(a)(2)(B) 34 CFR Secs. 200.58-200.61
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e) 34 CFR Secs. 200.360-200.43
4) Compliance with district improvement requirements	NCLB §1116(c)
5) Compliance with schoolwide program requirements	NCLB §1114 NCLB §1112 (c)(1)(L) NCLB §1111 (b)(8)(C) 34 CFR Secs. 200.26-28
6) Compliance with targeted assistance program requirements	NCLB §1111 (b)(8)(C) NCLB §1112 (c)(1)(L) NCLB §1115 NCLB §2122(c)

7) Compliance with equitable services to private school students requirements	NCLB §1120A
8) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
9) Compliance with supplement, not supplant requirements	NCLB §1120A
10) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
11) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
12) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
13) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87

During the on-site visit, IDOE spent time interviewing staff from Penn-Harris-Madison School Corporation at their central office. In addition, IDOE visited two schools where interviews were conducted with the principals and the Title I staff.

IDOE also reviewed Penn-Harris-Madison School Corporation's documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals; Compliance with Comparability

Background

IDOE interviewed the Title I Program Administrator. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Professional qualification requirements: Penn-Harris-Madison School Corporation was able to provide evidence that all core academic teachers and instructional paraprofessionals meet the highly qualified requirements.

Paraprofessionals: Penn-Harris-Madison School Corporation provided evidence that instructional paraprofessionals work under the direct supervision of a high quality teacher, which means that the teacher plans the instructional support activities for the paraprofessional to carry out, evaluates the achievement of the students with whom the paraprofessional is working, and the paraprofessional works in close and frequent proximity to the teacher.

Comparability: Penn-Harris-Madison School Corporation provided evidence that a comparability report was completed and submitted to the IDOE in October 2008. Supporting documentation was reviewed upon submission and verified during the onsite visit. Penn-Harris-Madison School Corporation has met the requirements for comparability.

5% set-aside: Penn-Harris-Madison School Corporation did not reserve 5% of its allocation to support assisting teachers in reaching the professional qualification requirements. All teachers in Title I schools are highly qualified.

Parents’ Right to Know regarding request for teacher qualifications: Penn-Harris-Madison School Corporation was able to demonstrate that letters had been mailed to all parents of students attending Title I schools informing the parents of their right to know about the qualifications of the student’s classroom teacher and where relevant, paraprofessionals.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

None.

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background

IDOE interviewed the Title I Program Administrator. In addition, IDOE reviewed policies and documentation provided.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Annual meeting: Penn-Harris-Madison School Corporation showed evidence that Title I schools held an annual meeting for Title I parents. Newsletters were created to send home to families. In addition, a PowerPoint presentation and sign-in sheets were provided as evidence.

School Parental Involvement Policy: Penn-Harris-Madison School Corporation provided evidence of School Parental Involvement Policies for Meadow's Edge Elementary and Madison Elementary which included all statutory components.

School-Parent Compact: Penn-Harris-Madison School Corporation provided evidence of School-Parent Compacts for Meadow's Edge Elementary and Madison Elementary which included all statutory components.

Recommendation: Although the school parental involvement policies and compacts contained all required components, IDOE found the policies to be exactly the same. IDOE recommends each Title I school update and tailor policies and compacts that are specific to each particular school.

Parent Information Resource Center (PIRC): Penn-Harris-Madison School Corporation showed evidence of PIRC information shared with parents through newsletters, school website, and in the parent resource room.

Reviewing the effectiveness of school parental involvement activities: Penn-Harris-Madison School Corporation did demonstrate that the district reviews the effectiveness of school parental involvement activities. The district frequently evaluates events using various program evaluations.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

LEA Parental Involvement Policy: Penn-Harris-Madison School Corporation provided evidence of an LEA Parental Involvement Policy, but it did not contain all required components. (See Attachment A)

Required Action: Penn-Harris-Madison School Corporation must send the IDOE, by January 15, 2010 their revised 2009-2010 LEA Parent Involvement Policy containing the required components.

Meaningful Consultation: While Meadow's Edge Elementary provided evidence of a School Parental Involvement Policy, there was no evidence that the policy, including the compact, was developed with meaningful consultation with parents.

Required Action: Penn-Harris-Madison School Corporation must ensure that all parental involvement policies and compacts are developed and revised annually with meaningful consultation with parents, as stated in Sec. 1118, in order to be in compliance with NCLB requirements. In addition, Meadow's Edge Elementary must submit to IDOE evidence of meaningful consultation with parents in the development of the School Parental Involvement Policy and Compact by January 15, 2010.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and Supplemental Educational Services.

Background

IDOE interviewed the Title I Program Administrator to discuss school improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

Notification to Parents: Penn-Harris-Madison School Corporation was able to provide proof of mailing that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school.

Implementation of School Improvement Plan: Penn-Harris-Madison School Corporation was able to demonstrate that the district monitors the implementation of the school improvement plan for Meadow's Edge Elementary. The Title I Program Administrator has been housed at Meadow's Edge Elementary to monitor the implementation of the plan and for additional technical assistance.

Public School Choice: Penn-Harris-Madison School Corporation provided evidence of mailing a letter informing parents of Indiana's Differentiated Accountability model and their option of school choice because of Meadow's Edge school improvement status.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

School Improvement Plan: Penn-Harris-Madison School Corporation provided evidence of a School Improvement Plan for Meadow's Edge Elementary, which was developed and revised with parents; however, the plan was a P.L. 221 plan and did not contain all of the required statutory components. (Attachment B)

Required Action: Penn-Harris-Madison School Corporation must ensure that all Title I schools in improvement have School Improvement Plans that contain the required components and are developed and revised annually with meaningful consultation with parents as stated in Sec. 1116 in order to be in compliance with NCLB requirements. IDOE recommends incorporating the required statutory components in the existing P.L. 221 plan.

In addition, Penn-Harris-Madison School Corporation must submit to the IDOE a School Improvement Plan for Meadow's Edge Elementary to verify compliance with NCLB requirements by January 15, 2010 for the 2009-2010 school year.

Peer Review of School Improvement Plan: Penn-Harris-Madison School Corporation did not provide evidence of a peer review process for each school in improvement.

Required Action: Penn-Harris-Madison School Corporation must, for Meadow's Edge Elementary, "*...establish a peer review committee, promptly review the plan, work with the school as necessary, and approve the school plan...*" [1116(b)(3)(E)]. All statutory requirements must be met. The peer review must take place within 45 days of the district receiving the plan, and evidence provided to the IDOE. School Improvement Plans, including evidence of peer review, must be submitted to the IDOE by February 1, 2010.

Other Matters:

Eligibility Requirements for Supplemental Educational Services (SES): Penn-Harris-Madison School Corporation is currently establishing a process to ensure each student meets eligibility requirements to receive SES. Meadow's Edge Elementary will be offering SES under the Differentiated Accountability model for the first time in the 2009-2010 school year.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Penn-Harris-Madison School Corporation is not identified for LEA improvement.

Monitoring Topic 5: Compliance with Schoolwide Program Requirements

Background

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school, federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Penn-Harris-Madison School Corporation does not have Title I schools operating schoolwide programs; however, in-depth technical assistance was provided about the schoolwide program option in the possibility of eligible district elementary schools going through the schoolwide planning process.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Background

IDOE interviewed the Title I Program Administrator and building principals regarding targeted assistance school program requirements.

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

Targeted Assistance Program: Penn-Harris-Madison School Corporation provided evidence that Title I program resources are used to help participating students meet the state's academic achievement standards. Scientifically-based research strategies and focused learning lessons are used in Title I instruction. Title I staff has a fixed schedule of daily responsibilities.

Coordination and Integration of Staff: Penn-Harris-Madison School Corporation was able to demonstrate that the Title I staff coordinate with classroom teachers and is involved in the same professional development opportunities.

Student Selection: Penn-Harris-Madison School Corporation used multiple, educationally related criteria to identify the students who are the most academically at-risk to receive Title I services.

Focus on Student Learning: Penn-Harris-Madison School Corporation implements a variety of instructional strategies to reach the diverse needs of student learners.

Madison Elementary and Meadow's Edge Elementary utilizes Waterford, Literacy Groups, and Focused Instruction to differentiate education for their learners. Focused Instruction follows the Total Quality/Effective School model that has been successful at closing the achievement gap of students from all socioeconomic backgrounds.

Students move into the Title I Reading Specialist program from a rank ordered student selection process. Schools also implement the RTI process where students who move to level three meet with an Interventionist for intensive remediation strategies and move toward testing. Students in K and grade one move fluently from groups as progress monitoring indicates.

In addition, schools use a variety of programs to help students meet the Indiana Academic Standards, including the Everyday Math Series, Wilson Reading, Study Island, Touch Math.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6

Proper Use of Funds: Penn-Harris-Madison School Corporation was not able to demonstrate that funds were used only for those students served by Title I. IDOE found the palm pilots purchased with Title I funds are being used with all students at Meadow's Edge Elementary.

Required Action: Penn-Harris-Madison School Corporation must immediately adjust the Title I program to ensure only identified Title I students are receiving services. The district discussed with IDOE the option of using other funding sources to reimburse Title I for the purchase of the palm pilots. The district must submit to IDOE evidence that the adjustment has been made to the targeted assistance program at Meadow's Edge Elementary by January 15, 2010.

Monitoring Topic 7: Compliance with Equitable Services to Private School Students Requirements

Background

IDOE interviewed the Title I Program Administrator and the Assistant Superintendent for Instruction regarding equitable services to private school students.

Areas of Compliance

Consultation with Private School Officials: Penn-Harris-Madison School Corporation was able to show evidence that consultation for Title II dollars occurred between the district and private schools.

Note: Penn-Harris-Madison School Corporation did not serve any private school students with Title I dollars.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with Statutory Set-aside Requirements

Background

IDOE interviewed the Title I Program Administrator and the Corporation Treasurer regarding the Title I statutory set-aside requirements.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

1 Percent Parental Involvement: Penn-Harris-Madison School Corporation provided evidence that one percent of the district's allocation for parental involvement was reserved and expended.

10 Percent Professional Development for School Improvement: Penn-Harris-Madison School Corporation provided evidence that Meadow's Edge Elementary School did set aside and expend ten percent for professional development.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Monitoring Topic 9: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Administrator and the Corporation Treasurer regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Areas of Compliance

Targeted Assistance Expenditures: Penn-Harris-Madison School Corporation provided records to show that Targeted Assistance Program expenditures have not supplanted non-federal resources. Additionally, there are measures in place to ensure the district supplements, not supplants.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None.

Monitoring Topic 10: Compliance with Financial Management Systems Requirements

Background

IDOE interviewed the Title I Program Administrator and the Corporation Treasurer regarding Penn-Harris-Madison School Corporation's financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Purchase orders and invoices: Penn-Harris-Madison School Corporation provided evidence that the Title I Program Administrator must review, approve, and sign all purchase orders and invoices for the program.

Contracted Services: Penn-Harris-Madison School Corporation has measures in place to ensure that consultants are working the amount of time for which they are paid. The Program Administrator and/or building principals attend each meeting.

Audit Findings: Penn-Harris-Madison School Corporation did not have any audit findings from Indiana State Board of Accounts.

Internal Control: Penn-Harris-Madison School Corporation demonstrated a process with good internal controls to track receipts and expenditures.

Salaries and Benefits: Penn-Harris-Madison School Corporation provided evidence that personnel stated in the application for Meadow's Edge Elementary and Madison Elementary matched fiscal records for Title I expenditures.

Maintenance of Effort: Penn-Harris-Madison School Corporation is in compliance with maintenance of effort requirements.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

None.

Monitoring Topic 11 Compliance with Compensation for Personnel Services Requirements

Background

IDOE interviewed the Title I Program Administrator, the Corporation Treasurer, as well as the building principals of two schools in regard to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Findings of Compliance

Compensation for Personnel Services Requirements (Semi-Annual Certification and Time and Effort logs): Penn-Harris-Madison School Corporation provided evidence that personnel in “split-funded” positions maintain Time and Effort logs and those in “fully-funded” positions maintain Semi-Annual Certifications that are in compliance with the requirements of OMB Circular A-87, Attachment B, Section 8. However, the Semi-Annual Certifications were completed for hours not yet worked (in advance) and should be for time already worked. Technical assistance was provided by IDOE.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

None.

Monitoring Topic 12: Compliance with complaint procedures

Background

IDOE interviewed the Title I Program Administrator and the Corporation Treasurer regarding the complaint process.

Areas of Compliance

Complaint Process: Penn-Harris-Madison School Corporation was able to demonstrate that the district has a complaint procedure policy. No formal complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

None.

Monitoring Topic 13: Compliance with equipment requirements – OMB A-87 and EDGAR 80.36

Background

IDOE interviewed the Program Administrator and the Corporation Treasurer regarding equipment acquired with Title I, Part A and ARRA funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Equipment Labeling: Penn-Harris-Madison School Corporation showed evidence that equipment purchased with Title I, Part A and ARRA funds was properly labeled and identified.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Inventory List: Penn-Harris-Madison School Corporation did not show evidence of an equipment and technology inventory list that contains all required components.

Required Action: Penn-Harris-Madison School Corporation must develop an inventory list to include all required components (Attachment C). In addition, the completed inventory list must be submitted to the IDOE by January 15, 2010.

Attachment A

SEC. 1118. PARENTAL INVOLVEMENT.

(a) LOCAL EDUCATIONAL AGENCY POLICY-

(1) IN GENERAL- A local educational agency may receive funds under this part only if such agency implements programs, activities, and procedures for the involvement of parents in programs assisted under this part consistent with this section. Such programs, activities, and procedures shall be planned and implemented with meaningful consultation with parents of participating children.

(2) WRITTEN POLICY- Each local educational agency that receives funds under this part shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall be incorporated into the local educational agency's plan developed under section 1112, establish the agency's expectations for parent involvement, and describe how the agency will —

(A) involve parents in the joint development of the plan under section 1112, and the process of school review and improvement under section 1116;

(B) provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance;

(C) build the schools' and parents' capacity for strong parental involvement as described in subsection (e);

(D) coordinate and integrate parental involvement strategies under this part with parental involvement strategies under other programs, such as the Head Start program, Reading First program, Early Reading First program, Even Start program, Parents as Teachers program, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs;

(E) conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities authorized by this section (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background), and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies described in this section; and

(F) involve parents in the activities of the schools served under this part.

(3) RESERVATION-

(A) IN GENERAL- Each local educational agency shall reserve not less than 1 percent of such agency's allocation under subpart 2 of this part to carry out this section, including promoting family literacy and parenting skills, except that this paragraph shall not apply if 1 percent of such agency's allocation under subpart 2 of this part for the fiscal year for which the determination is made is \$5,000 or less.

(B) PARENTAL INPUT- Parents of children receiving services under this part shall be involved in the decisions regarding how funds reserved under subparagraph (A) are allotted for parental involvement activities.

(C) DISTRIBUTION OF FUNDS- Not less than 95 percent of the funds reserved under subparagraph (A) shall be distributed to schools served under this part.

(b) SCHOOL PARENTAL INVOLVEMENT POLICY-

(1) IN GENERAL- Each school served under this part shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the

requirements of subsections (c) through (f). Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. Such policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.

(2) SPECIAL RULE- If the school has a parental involvement policy that applies to all parents, such school may amend that policy, if necessary, to meet the requirements of this subsection.

(3) AMENDMENT- If the local educational agency involved has a school district-level parental involvement policy that applies to all parents, such agency may amend that policy, if necessary, to meet the requirements of this subsection.

(4) PARENTAL COMMENTS- If the plan under section 1112 is not satisfactory to the parents of participating children, the local educational agency shall submit any parent comments with such plan when such local educational agency submits the plan to the State.

(c) POLICY INVOLVEMENT- Each school served under this part shall —

(1) convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under this part and to explain the requirements of this part, and the right of the parents to be involved;

(2) offer a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement;

(3) involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy and the joint development of the schoolwide program plan under section 1114(b)(2), except that if a school has in place a process for involving parents in the joint planning and design of the school's programs, the school may use that process, if such process includes an adequate representation of parents of participating children;

(4) provide parents of participating children —

(A) timely information about programs under this part;

(B) a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet; and

(C) if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible; and

(5) if the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the local educational agency.

(d) SHARED RESPONSIBILITIES FOR HIGH STUDENT ACADEMIC ACHIEVEMENT- As a component of the school-level parental involvement policy developed under subsection (b), each school served under this part shall jointly develop with parents for all children served under this part a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall —

(1) describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and

(2) address the importance of communication between teachers and parents on an ongoing basis through, at a minimum —

(A) parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates the individual child's achievement;

(B) frequent reports to parents on their children's progress; and

(C) reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities.

(e) **BUILDING CAPACITY FOR INVOLVEMENT**- To ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, each school and local educational agency assisted under this part —

(1) shall provide assistance to parents of children served by the school or local educational agency, as appropriate, in understanding such topics as the State's academic content standards and State student academic achievement standards, State and local academic assessments, the requirements of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children;

(2) shall provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate, to foster parental involvement;

(3) shall educate teachers, pupil services personnel, principals, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school;

(4) shall, to the extent feasible and appropriate, coordinate and integrate parent involvement programs and activities with Head Start, Reading First, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children;

(5) shall ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand;

(6) may involve parents in the development of training for teachers, principals, and other educators to improve the effectiveness of such training;

(7) may provide necessary literacy training from funds received under this part if the local educational agency has exhausted all other reasonably available sources of funding for such training;

(8) may pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and child care costs, to enable parents to participate in school-related meetings and training sessions;

(9) may train parents to enhance the involvement of other parents;

(10) may arrange school meetings at a variety of times, or conduct in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend such conferences at school, in order to maximize parental involvement and participation;

(11) may adopt and implement model approaches to improving parental involvement;

(12) may establish a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section;

(13) may develop appropriate roles for community-based organizations and businesses in parent involvement activities; and

(14) shall provide such other reasonable support for parental involvement activities under this section as parents may request.

(f) **ACCESSIBILITY**– In carrying out the parental involvement requirements of this part, local educational agencies and schools, to the extent practicable, shall provide full opportunities for the participation of parents with limited English proficiency, parents with disabilities, and parents of

migratory children, including providing information and school reports required under section 1111 in a format and, to the extent practicable, in a language such parents understand.

(g) INFORMATION FROM PARENTAL INFORMATION AND RESOURCE CENTERS- In a State where a parental information and resource center is established to provide training, information, and support to parents and individuals who work with local parents, local educational agencies, and schools receiving assistance under this part, each local educational agency or school that receives assistance under this part and is located in the State shall assist parents and parental organizations by informing such parents and organizations of the existence and purpose of such centers.

(h) REVIEW- The State educational agency shall review the local educational agency's parental involvement policies and practices to determine if the policies and practices meet the requirements of this section.

Penn-Harris-Madison School Corporation

Review the LEA Parent Involvement Policy prior to mailing to the IDOE to ensure that all requirements listed below are met:

Parental Involvement Policy Requirements:	Yes/No
1. Involve parents in the joint development of the plan and the process of school review and improvement	No
2. Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance	No
3. Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement <input type="checkbox"/> Coordination and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request 	Yes Yes Yes Yes Yes
4. Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs.	Yes
5. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parent involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies.	No
6. Involve parents in the activities of the schools served under Title I	No

Attachment B

NCLB School Improvement Plan Requirements. Contained within Section 1116 (b).

“(3) SCHOOL PLAN.—

“(A) REVISED PLAN.—After the resolution of a review under paragraph (2), each school identified under paragraph (1) for school improvement shall, not later than 3 months after being so identified, develop or revise a school plan, in consultation with parents, school staff, the local educational agency serving the school, and outside experts, for approval by such local educational agency. The school plan shall cover a 2-year period and—

“(i) incorporate strategies based on scientifically based research that will strengthen the core academic subjects in the school and address the specific academic issues that caused the school to be identified for school improvement, and may include a strategy for the implementation of a comprehensive school reform model that includes each of the components described in part F;

“(ii) adopt policies and practices concerning the school’s core academic subjects that have the greatest likelihood of ensuring that all groups of students specified in section 1111(b)(2)(C)(v) and enrolled in the school will meet the State’s proficient level of achievement on the State academic assessment described in section 1111(b)(3) not later than 12 years after the end of the 2001–2002 school year;

“(iii) provide an assurance that the school will spend not less than 10 percent of the funds made available to the school under section 1113 for each fiscal year that the school is in school improvement status, for the purpose of providing to the school’s teachers and principal high-quality professional development that—

“(I) directly addresses the academic achievement problem that caused the school to be identified for school improvement;

“(II) meets the requirements for professional development activities under section 1119; and

“(III) is provided in a manner that affords increased opportunity for participating in that professional development;

“(iv) specify how the funds described in clause (iii) will be used to remove the school from school improvement status;

“(v) establish specific annual, measurable objectives for continuous and substantial progress by each group of students specified in section 1111(b)(2)(C)(v) and enrolled in the school that will ensure that all such groups of students will, in accordance with adequate

yearly progress as defined in section 1111(b)(2), meet the State's proficient level of achievement on the State academic assessment described in section 1111(b)(3) not later than 12 years after the end of the 2001–2002 school year;

“(vi) describe how the school will provide written notice about the identification to parents of each student enrolled in such school, in a format and, to the extent practicable, in a language that the parents can understand;

“(vii) specify the responsibilities of the school, the local educational agency, and the State educational agency serving the school under the plan, including the technical assistance to be provided by the local educational agency under paragraph (4) and the local educational agency's responsibilities under section 1120A;

“(viii) include strategies to promote effective parental involvement in the school;

“(ix) incorporate, as appropriate, activities before school, after school, during the summer, and during any extension of the school year; and

“(x) incorporate a teacher mentoring program.

“(B) CONDITIONAL APPROVAL.—The local educational agency may condition approval of a school plan under this paragraph on—

“(i) inclusion of one or more of the corrective actions specified in paragraph (7)(C)(iv); or

“(ii) feedback on the school improvement plan from parents and community leaders.

“(C) PLAN IMPLEMENTATION.—Except as provided in subparagraph (D), a school shall implement the school plan (including a revised plan) expeditiously, but not later than the beginning of the next full school year following the identification under paragraph (1).

“(D) PLAN APPROVED DURING SCHOOL YEAR.—Notwithstanding subparagraph (C), if a plan is not approved prior to the beginning of a school year, such plan shall be implemented immediately upon approval.

“(E) LOCAL EDUCATIONAL AGENCY APPROVAL.—The local educational agency, within 45 days of receiving a school plan, shall—

“(i) establish a peer review process to assist with review of the school plan; and

“(ii) promptly review the school plan, work with the school as necessary, and approve the school plan if the plan meets the requirements of this paragraph.

School Improvement Plan Checklist

MEADOW'S EDGE ELEMENTARY SCHOOL

Directions: Use the checklist below in reviewing School Improvement Plans for your LEA. List the page number where each component can be found in the column provided. If a plan does not include all ten components, it is out of compliance with NCLB requirements and will need to be adjusted.

According to Sec. 1116 (b) (3) (A)

After identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

*Consolidated plans are encouraged and accepted.

Ten Components of School Improvement Plan*	Yes/No
1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	Yes
2. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	Needs more focus on Math per AYP results
3. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <input type="checkbox"/> Directly address the academic achievement problem that caused the school to be identified <input type="checkbox"/> Meets NCLB's professional development requirements <input type="checkbox"/> Provides increased opportunity for participating in professional development	No (Budget page must be inserted in the plan.)
4. Specifies how professional development funds will be used to remove the school from improvement status	Needs more focus on Math per AYP results
5. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	Goals must be updated through 2008-2011
6. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	No (School Improvement Letter must be inserted in the plan.)
7. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	Yes
8. Strategies to promote effective parental involvement in the school	Yes
9. Activities before and after school, during summer, and during any extension of the school year	Yes
10. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	Yes

Attachment C

EDGAR 80.32

Sec. 80.32 Equipment.

(a) Title. Subject to the obligations and conditions set forth in this section, title to equipment acquired under a grant or subgrant will vest upon acquisition in the grantee or subgrantee respectively.

(b) States. A State will use, manage, and dispose of equipment acquired under a grant by the State in accordance with State laws and procedures. Other grantees and subgrantees will follow paragraphs (c) through (e) of this section.

(c) Use. (1) Equipment shall be used by the grantee or subgrantee in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency.

(2) The grantee or subgrantee shall also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, providing such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by the awarding agency. User fees should be considered if appropriate.

(3) Notwithstanding the encouragement in Sec. 80.25(a) to earn program income, the grantee or subgrantee must not use equipment acquired with grant funds to provide services for a fee to compete unfairly with private companies that provide equivalent services, unless specifically permitted or contemplated by Federal statute.

(4) When acquiring replacement equipment, the grantee or subgrantee may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property, subject to the approval of the awarding agency.

(d) Management requirements. Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place will, as a minimum, meet the following requirements:

(1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of property, who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

(2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

(3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.

(4) Adequate maintenance procedures must be developed to keep the property in good condition.

(5) If the grantee or subgrantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

(e) Disposition. When original or replacement equipment acquired under a grant or subgrant is no longer needed for the original project or program or for other activities currently or previously supported by a Federal agency, disposition of the equipment will be made as follows:

(1) Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.

(2) Items of equipment with a current per unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.

(3) In cases where a grantee or subgrantee fails to take appropriate disposition actions, the awarding agency may direct the grantee or subgrantee to take excess and disposition actions.

(f) Federal equipment. In the event a grantee or subgrantee is provided federally-owned equipment:

(1) Title will remain vested in the Federal Government.

(2) Grantees or subgrantees will manage the equipment in accordance with Federal agency rules and procedures, and submit an annual inventory listing.

(3) When the equipment is no longer needed, the grantee or subgrantee will request disposition instructions from the Federal agency.

(g) Right to transfer title. The Federal awarding agency may reserve the right to transfer title to the Federal Government or a third party named by the awarding agency when such a third party is otherwise eligible under existing statutes. Such transfers shall be subject to the following standards:

(1) The property shall be identified in the grant or otherwise made known to the grantee in writing.

(2) The Federal awarding agency shall issue disposition instruction within 120 calendar days after the end of the Federal support of the project for which it was acquired. If the Federal awarding agency fails to issue disposition instructions within the 120 calendar-day period the grantee shall follow Sec. 80.32(e).

(3) When title to equipment is transferred, the grantee shall be paid an amount calculated by applying the percentage of participation in the purchase to the current fair market value of the property.

(h) The provisions of paragraphs (c), (d), (e), and (g) of this section do not apply to disaster assistance under 20 U.S.C. 241-1(b)-(c) and the construction provisions of the Impact Aid Program, 20 U.S.C. 631-647.



Equipment/Technology Inventory (Property Records)

Instructions: In reviewing the inventory list, please ensure that each of the ten components listed below are included.

All Property Records (inventories) must include:	Yes
1. A description of the property	
2. A serial number or other identification number	
3. The source of the property	
4. Who holds title	
5. The acquisition date	
6. The cost of the property	
7. The percentage of Federal participation in the cost of the property	
8. Where the property is located	
9. The use and condition of the property	
10. The ultimate disposition data including the date of disposal and sale price of the property	